

**FRIEDMAN  
KAPLAN**

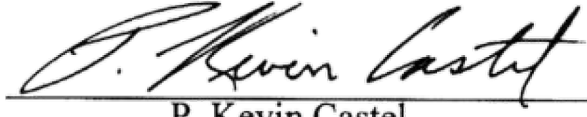
**JOHN N. ORSINI**  
jorsni@fklaw.com  
212.833.1186

The request for an extension of time to file  
a motion for attorneys' fees and cost is  
granted and the proposed schedule adopted.  
**SO ORDERED.**  
Dated: 7/28/2025

July 27, 2025

**VIA ECF**

The Honorable P. Kevin Castel  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

  
P. Kevin Castel  
United States District Judge

Re: *Steven M. Clarke, et al. v. TRIGO U.S., Inc., et al.*,  
No. 1:22-cv-01917 (PKC) (BCM)

Dear Judge Castel:

We represent plaintiffs/counterclaim defendants ("Plaintiffs") in the above-captioned action. Pursuant to Item 1.C of Your Honor's Individual Practices, we write on behalf of all parties seeking an extension of the date by which defendant/counterclaim plaintiff TRIGO U.S., Inc. ("TRIGO") must file its motion for attorneys' fees (the "Motion"), in order to permit the parties time to memorialize an agreement they reached over the weekend in respect of Plaintiffs' satisfaction of the Final Judgment entered by the Court (the "Judgment").

In its Findings of Fact and Conclusions of Law, the Court (i) ordered TRIGO to submit its Motion within twenty-one days of entry of judgment, (ii) ordered Plaintiffs to respond within 14 days of the Motion, and (iii) permitted TRIGO to reply within seven days of Plaintiffs' response. (ECF 120 at 81.) The Court entered the Judgment on July 8, 2025. (ECF 128.) Accordingly, the deadline by which TRIGO must submit its Motion is July 29, 2025, and Plaintiffs' deadline to respond and TRIGO's deadline to reply are dependent on the date TRIGO files its motion.

On July 26, 2025, the parties reached an agreement in principle on the key terms of a settlement in connection with Plaintiffs' satisfaction of the Judgment that will render the filing of the Motion unnecessary. The parties intend to work diligently to memorialize this agreement in a formal settlement document. In the meantime, the parties jointly seek an adjournment of the aforementioned Motion deadlines to afford the parties sufficient time to finalize such a settlement document. This is the parties' first request for an extension. The parties propose that the Court adjourn the Motion deadlines such that TRIGO shall file its Motion by August 12, 2025; Plaintiffs shall respond within 14 days of the filing

- 2 -

July 27, 2025

of the Motion; and TRIGO may reply to Plaintiffs' response within seven days after Plaintiffs' response. If the parties are able to enter into a definitive settlement agreement before the expiration of the extended deadline, then the parties will promptly inform the Court.

We thank the Court for its consideration of this request.

Respectfully submitted,

*/s/ John N. Orsini*

John N. Orsini

cc: All Counsel of Record (*via* ECF)